

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, David J. Backlund, a Special Agent with the Federal Bureau of Investigation (“FBI”) being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent of the FBI since September 2008, and am currently assigned to the FBI’s Child Exploitation Operational Unit within the Criminal Investigative Division. As part of my duties as a Special Agent, I am assigned to investigate violations of federal law, including the online exploitation of children. This includes violations pertaining to the illegal trafficking, production, transmission, possession, and receipt of material depicting the sexual exploitation of minors.

2. I am submitting this affidavit in support of a criminal complaint and arrest warrant for JOHN R. YOUNG, year of birth: 1977, social security number: XXX-XX-5192. I submit there is probable cause to believe that in or around 2021, in the Eastern District of Pennsylvania and elsewhere, JOHN R. YOUNG engaged in the sexual exploitation of children in violation of 18 U.S.C. § 2251(a) and (e). I further submit that there is probable cause to believe that in approximately September 2023, in the Eastern District of Pennsylvania and elsewhere, JOHN R. YOUNG distributed child pornography in violation of 18 U.S.C. § 2252A(a)(2) and (b)(1). The term “child pornography,” as used in this affidavit, refers to the definition set forth in 18 U.S.C. § 2256(8)(A).

3. Title 18 U.S.C. § 2251(a) and (e) prohibit any person from employing, using, persuading, inducing, enticing, or coercing any minor to engage in, or who has a minor assist any other person to engage in, any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct, if such person knows or has reason to know that such visual depiction will be

transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, if that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or if such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed.

4. Title 18 U.S.C. § 2252A(a)(2) and (b)(1) prohibit any person from knowingly distributing any child pornography or any material that contains child pornography using any means or facility of interstate or foreign commerce or that has been mailed, or has been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

5. The statements contained in this affidavit are based in part on information provided by FBI Special Agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by FBI agents and computer forensic professionals; and my experience, training and background as a Special Agent with the FBI. Since this affidavit is being submitted for the purpose of securing a Criminal Complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe JOHN R. YOUNG has violated 18 U.S.C. §§ 2251(a) and (e) and 2252A(a)(2) and (b)(1).

6. The FBI is investigating a website (hereinafter referred to as the “TARGET WEBSITE”) that allows users to engage in online communications with other users. It launched in approximately 2019. The TARGET WEBSITE expressly describes itself as a “child pornography community” that exists “to serve the pedophile community around the globe” and is “not intended to serve people who do not belong to such community.”

7. Users regularly use the website to advertise and distribute child pornography. Child pornography images and videos are trafficked through the TARGET WEBSITE via the posting of web links on the website’s forum. These links allow a user to navigate to another website, such as a file-hosting website where images and/or videos are stored, in order to download the linked-to images and videos. The site also allows users to engage in online discussion with other users, either via posts that are openly accessible to any user of the site, or in one-to-one private message chats between two users. The TARGET WEBSITE consisted of at least 100 registered members and more than 25 members who helped manage the website as “staff.” Registered members of the TARGET WEBSITE, and any user with a higher status than registered member, all had their usernames reserved for their exclusive use and needed to access their account through a password chosen by the user.

8. The FBI’s investigation has further revealed that a user of the TARGET WEBSITE, acting under a particular online alias and referred to here as the “SUBJECT USER,” was an active member of the website who posted files on the TARGET WEBSITE, including some depicting child pornography. The FBI has determined that the SUBJECT USER had been active on the TARGET WEBSITE since approximately October 2021.

9. The SUBJECT USER deleted a large portion of his posts in October 2023, but an FBI Online Covert Employee (hereinafter referred to as the “OCE”) who maintains a presence on the TARGET WEBSITE was able to document several of these posts.

10. In approximately September 2023, the SUBJECT USER made a post on the TARGET WEBSITE that included the phrase “blonde girl.” In this post, the SUBJECT USER stated “*Most have seen this but mirrors are always good to have so the classics are available. Enjoy.*” The post included a link marked “download” that was no longer active when the OCE attempted to capture it. The post also include an embedded image that consisted of what appear to be twenty screenshots from a video. Each screenshot has a timestamp in the lower-right corner. The screen shots depict a prepubescent girl with blonde hair who appears based on her physical appearance to be between approximately seven and nine years of age. In the first several screenshots, the girl appears fully clothed. In later screenshots, the girl has removed her pants and undergarments and spreads her legs to display her naked vagina to the camera. In three of the screenshots, she appears to be inserting a toothbrush or similarly shaped object into her vagina. The girl has no visible pubic hair or breast development and she has young facial and bodily features.

11. In early 2023, the OCE observed that the SUBJECT USER had made a post on the TARGET WEBSITE, the title of which referred to his “experience” with a minor identified by the minor’s relationship with the SUBJECT USER. This minor is hereinafter referred to as “Minor Victim 1.”¹ In this post, the SUBJECT USER stated: “*It's been a while since I posted so here's what's happened since my original message about [Minor Victim 1]. For background,*

¹ Minor Victim 1’s identity and relationship to YOUNG are known to investigators but are being withheld to protect Minor Victim 1’s privacy and security.

[Minor Victim 1] is a beautiful then-9 yo who spent a lot of time with me and was flirty. One night, she wore a loose pair of shorts with no underwear and we were able to enjoy some light touching of her pussy. She was 'asleep' at the time but I think she was pretending since she moved for better position and her wetness showed she was enjoying herself too. Unfortunately, the pics I took have been lost though I had posted one originally. ... I was able to see glimpses of her underwear and sometimes what's below that. ... I also got some video of her with a couple of screenshots below. The second is how I want to have her some day." This post included two images of a naked prepubescent girl estimated to be between nine and eleven years of age. One photo depicts her from the upper chest to the nose while the other depicts her from her thighs to the bridge of her nose. In one photo, she appears to be looking into a camera or a mirror while covering her breast area with her hands. The girl has young bodily and facial features. In this post, the SUBJECT USER also stated with regard to Minor Victim 1 that *"I was able to get a handjob using her hand. I'll tell you, there is nothing like the feeling of a little girl's hand wrapped around your cock and jerking you off. I tried to slip it into her mouth but couldn't get a good position. I'm sure that will come in time though as she gets older and more mature (11 now)."* In the comments below the post, the SUBJECT USER made an additional post with the comment *"this is how she looks from the back,"* with an image depicting a fully nude prepubescent female from behind with her buttocks exposed. The image shows from her ankles to her head.

IDENTIFICATION OF JOHN R. YOUNG AS THE SUBJECT USER

12. On or about October 17, 2023, the FBI executed a search warrant at YOUNG's residence in Easton, Pennsylvania, in the Eastern District of Pennsylvania. During the execution of the search warrant, FBI agents discovered extensive evidence of YOUNG's involvement with

child pornography. For example, agents seized a PNY thumb drive from YOUNG's home office that contained the following content:

- a. A video depicting a prepubescent girl who appears to be approximately seven to nine years old based on her physical appearance. In the video, the girl is depicted naked and performing oral sex on an adult man's naked erect penis. The video is shot from the man's perspective looking down at the girl while she performs the sex act. The girl has no noticeable breast development and has young bodily and facial features.
 - b. A video depicting a naked prepubescent girl who appears to be approximately seven to nine years old based on her physical appearance. In the video, an adult man who is naked from the waist up and wearing gloves and a mask is depicted having prolonged anal sex with the girl. The girl has no noticeable breast development or pubic hair and has young bodily and facial features.
 - c. A photo depicting a prepubescent girl who appears to be approximately six to eight years old based on her physical appearance. In the photo, the girl's underwear is pulled to the side, prominently displaying her vagina and anus, with a phallic object inserted into her vagina that she is manipulating. The girl has no noticeable breast development or pubic hair and has young bodily features.
13. This PNY thumb drive also contained a folder with a name that consisted of a single letter. This letter is also the first letter in Minor Victim 1's first name. This folder contained a photo of what appears to be a close-up image of a prepubescent girl's vagina. In the photo, an adult man's hand is depicted holding the girl's purple underwear to the side to expose her vagina to the camera.

14. This folder also included multiple videos that depict Minor Victim 1 entering a bathroom, disrobing, showering, and looking at herself in the mirror. Some of these videos depict Minor Victim 1's naked genitals. In some of these videos, YOUNG can be seen appearing to set up a camera in the bathroom before Minor Victim 1 enters, and in some videos, YOUNG can also be seen appearing to retrieve the camera once Minor Victim 1 finishes and leaves the bathroom. These videos bear a strong resemblance to the images that the SUBJECT USER posted to the TARGET WEBSITE as described above in paragraph 11, above. FBI agents recovered two "spy cameras" disguised to look like pens from YOUNG's office.

15. During the execution of the search warrant, and after being advised of his rights, YOUNG stated the following:

a. He is the SUBJECT USER on the TARGET WEBSITE and has been a member of the TARGET WEBSITE for at least two years. He confirmed that he was the user of the username associated with posts made to the TARGET WEBSITE, including the post described above in paragraph 11.

b. He posted child pornography to the TARGET WEBSITE and opened and viewed child pornography via the TARGET WEBSITE.

c. FBI agents showed YOUNG the photograph described in paragraph 13, above.

YOUNG admitted that he took this photograph approximately two years ago and it depicted Minor Victim 1, who was 9 years old at the time. He further stated that he took this image at his home while Minor Victim 1 was sleeping and that he did so for the purpose of sharing the image on the TARGET WEBSITE.

YOUNG stated that he did in fact share the image over the TARGET WEBSITE.

YOUNG also stated that Minor Victim 1 is currently 11 years old.

- d. FBI agents also showed YOUNG images that the SUBJECT USER posted to the TARGET WEBSITE that are described in paragraph 11, above. YOUNG stated that the images depict Minor Victim 1, and that he created the images with a spy camera in his bathroom when she visited his home.
- e. He acknowledged that he told other users on the TARGET WEBSITE that he had engaged in explicit sexual conduct with Minor Victim 1 off-camera. He claimed, however, that these statements were not true.
- f. He maintains a collection of child pornography on his devices. He specifically identified the PNY thumb drive described above as containing pornography. He also identified a laptop he used to access the TARGET WEBSITE.

CONCLUSION

16. For these reasons, your Affiant respectfully submits that there is probable cause to believe that in or about 2021, JOHN R. YOUNG engaged in the sexual exploitation of children in violation of 18 U.S.C. § 2251(a) and (e) in the Eastern District of Pennsylvania and elsewhere. Your Affiant further respectfully submits that there is probable cause to believe that in or about September 2023, JOHN R. YOUNG distributed child pornography in violation of 18 U.S.C. § 2252A(a)(2) and (b)(1) in the Eastern District of Pennsylvania and elsewhere. I therefore respectfully request that the Court authorize a Criminal Complaint and Arrest Warrant for JOHN R. YOUNG.

Respectfully submitted,

/s/ David J. Backlund

David J. Backlund
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to me by applicant by
telephone per the requirements of Fed. R.
Crim. P. 4(d) and 4.1 on this 17th day of
October, 2023.

/s/ PAMELA A. CARLOS

HON. PAMELA A. CARLOS
UNITED STATES MAGISTRATE JUDGE